



FARM BUREAU SAN DIEGO COUNTY

1670 East Valley Parkway, Escondido CA 92027-2409

Phone: (760) 745-3023 • Fax: (760) 489-6348

E-mail: sdcfb@sdfarmbureau.org • Website: www.sdfarmbureau.org

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Mark Slovick
County of San Diego
Department of Planning & Development Services
5510 Overland Ave., Suite 110
San Diego, CA 92123

Dear Mr. Slovick:

Thank you for this opportunity to comment on the draft Environmental Impact Report for the proposed Lilac Hills Ranch Master Planned Community (EIR). The San Diego County Farm Bureau represents farmers throughout San Diego County with the mission to represent San Diego agriculture through public relations, education, and public policy advocacy in order to promote the economic viability of agriculture balanced with appropriate management of natural resources.

Our first comment relates to Subchapter 2.4 Agricultural Resources. Section 2.4.1.1 Regulatory Framework contains summaries of various federal, state, and county laws, ordinances, and policies that are to be considered in project planning and development. We observe an omission of an important clause that appears in the Goals and Policies of the County of San Diego's General Plan. Goal COS-6 contains the following statement:

Discourage development that is potentially incompatible with intensive agricultural uses includes schools and civic buildings where the public gather, daycare facilities under private institutional use, private institutional uses (e.g., private hospitals or rest homes), residential densities higher than two dwelling units per acre, and offices and retail commercial.

We believe reference to the County of San Diego's General Plan policies regarding agriculture should be included as part of the considered regulatory framework. Additionally, we do not find where the EIR deals with those policies, particularly in reference to the statement above. Key to that discussion would be addressing the phrase "potentially incompatible" with all aspects of the proposed project. Our chief concern, as will be mentioned again in this correspondence, is for the continuing and unobstructed operation of current and future farming enterprises outside the boundaries of the proposed project.

Our second set of comments are in reference to Section 2.4.2.3 Indirect Conversion of Agricultural Resources. This section sets the stage for determining whether the proposed development could result in conversion of a San Diego County agricultural resource to non agricultural use. In making that determination the analysis fails to take into consideration the full range of agricultural uses that could be placed on the land in the vicinity of the proposed project. Selection and placement of agricultural crops on the land is not static. Crops are constantly changing as are the cultural methods needed to care for those crops. Farmers must have the leeway to change crops when market conditions demand change. Throughout the EIR the assumption is made that the crops on the ground today are the crops that will be there in the future. If conflicts with adjacent development preclude a farmer from selecting a crop that will be most viable and allow that farm to continue to exist, then, in effect, conversion of an agricultural resource to non-agricultural use is likely to occur.

It is our belief that the analysis for determination of significance and resulting mitigation should be based on the fact that crops do change as has been the historical pattern in San Diego County.

There are areas adjacent to the proposed development that are not currently in agricultural production, but agricultural uses are allowed. As written, it appears the assumption in the EIR is that these lands have no potential to be put into agricultural production. Should a farmland owner be unable to put that land into production because of conflicts from the adjacent development, then, again, conversion of an agricultural resource to non-agricultural use is likely to occur.

It is our belief that an analysis for determination of significance and resulting mitigation should be done to protect those potential farmland areas adjacent or near the proposed development.

We would now like to comment on the mitigation measures contained in Table S-1, 2.4 Agricultural Resources. In most cases the potential effects are described as having “significant adjacency” issues that must be mitigated. It is our opinion that six-foot high fences and 50 foot buffers are woefully inadequate and do not meet the test of protecting the existing and future agricultural uses. It should also be noted that impacts run both directions and it would seem a more mutually successful mitigation would be to push development further from the project boundaries to avoid conflicts. This comment extends also to the potential farmlands adjacent or near the proposed development.

Our final comment is on the EIR’s lack of an analysis on the impacts to rural agricultural when an intense urban use is placed in its midst. The EIR focus on farm impacts outside the project look only at the farm operations directly adjacent to the proposed project. Our concern is for those farmers in the vicinity of the proposed project who wish to continue farming without the burden of urban/rural conflicts and intrusions onto their farms. It is our opinion that the size of the proposed project requires a more robust analysis of the impacts to farmers not only adjacent to the proposed project, but even up to several hundred yards beyond the proposed project.

Again, thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Larson", written in a cursive style.

Eric Larson
Executive Director

Cc: Ha Dang, County Agricultural Commissioner